

Jennie Lee Anderson (SBN 203586)
Lori E. Andrus (SBN 205816)
ANDRUS ANDERSON LLP
155 Montgomery Street, Suite 900
San Francisco, California 94104
Telephone: 415-986-1400
jennie@andrusanderson.com
lori@andrusanderson.com

Adam J. Levitt (*pro hac vice*)
DICELLO LEVITT GUTZLER LLC
Ten North Dearborn Street, Eleventh Floor
Chicago, Illinois 60602
Telephone: 312-214-7900
alevitt@dicellolevitt.com

W. Daniel "Dee" Miles, III (*pro hac vice*)
**BEASLEY, ALLEN, CROW,
METHVIN, PORTIS & MILES, P.C.**
218 Commerce Street
Montgomery, Alabama 36104
Telephone: 334-269-2343
Dee.Miles@beasleyallen.com

Counsel for Plaintiffs and the Proposed Classes (additional counsel appear on signature page)

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

MONTEVILLE SLOAN, JR., RAUL SIQUEIROS,
TODD AND JILL CRALLEY, JOSEPH
BRANNAN, LARRY GOODWIN, MARC
PERKINS, THOMAS SHORTER, DERICK
BRADFORD, GABRIEL DEL VALLE, KEVIN
HANNEKEN, EDWIN AND KATELYN DOEPEL,
DAN MADSON, JAMES FAULKNER, JOSEPH
OLIVIER, SCOTT SMITH, ROSS DAHL, DREW
PETERSON, MICHAEL WARE, STEVE
KITCHEN, JOHN KNOLL, BARBARA MOLINA,
DENNIS VITA, WILLIAM DAVIS, JR., THOMAS
SZEP, MIKE WARPINSKI, WILLIAM
MARTELL, JOHN GRAZIANO, JOSHUA
BYRGE, RUDY SANCHEZ, CHRISTOPHER
THACKER, KELLY HARRIS, JAMES
ROBERTSON, and JONAS BEDNAREK,
individually and on behalf of all others similarly
situated,

Plaintiffs,

v.

GENERAL MOTORS LLC,

Defendant.

Case No.: 16-cv-07244-EMC

**DECLARATION OF H. CLAY BARNETT,
III, IN SUPPORT OF PLAINTIFFS'
OPPOSITION TO GENERAL MOTORS
LLC'S MOTION FOR PARTIAL
SUMMARY JUDGMENT ON CLAIMS OF
ACCELERATED PLAINTIFFS**

I, H. Clay Barnett, III, hereby declare as follows:

1. I am a principal with the law firm of Beasley, Allen, Crow, Methvin, Portis & Miles, P.C. I have been admitted *pro hac vice* to represent Plaintiffs in the above-captioned matter. I make this declaration based on my personal knowledge of the facts contained herein and if called as a witness I could and would competently testify thereto.

2. I submit this Declaration in support of Plaintiffs' Opposition to General Motors LLC's Motion for Partial Summary Judgement on claims of Accelerated Plaintiffs.

3. Attached hereto as Exhibits are true and correct copies of the following documents:

Exhibit No.	Description
1	Transcript of the May 23, 2019 Deposition of Thomas Halka
2	Transcript of the May 8, 2019 Deposition of Grant Tappen
3	Transcript of the May 30, 2019 Deposition of Steven Pfromm
4	Document produced by GM in this litigation with Bates No. GM-000128725
5	Transcript of May 21, 2019 Deposition of Yoon Lee
6	Document produced by MAHLE in this litigation with Bates No. MAHLE-002261
7	Transcript of the May 15, 2019 Deposition of Richard Ricchi
8	Transcript of the May 17, 2019 Deposition of Gary Cygan, Jr.
9	Transcript of the April 12, 2019 Deposition of Wai Nguyen
10	Transcript of the May 8, 2019 30(b)(6) Deposition of Grant Tappen
11	Document produced by GM in this litigation with Bates No. GM-000128867
12	Amended Expert Report of Dr. Jeffrey K. Ball
13	Document produced by GM in this litigation with Bates No. GM-000577431
14	Document produced by GM in this litigation with Bates No. GM-000579376
15	GM's Responses to Plaintiffs' Second Set of Interrogatories
16	Document produced by GM in this litigation with Bates No. GM-000578690
17	Document produced by GM in this litigation with Bates No. GM-000127816
18	Document produced by GM in this litigation with Bates No. GM-000312645
19	Document produced by GM in this litigation with Bates No. GM-000579013
20	Transcript of the April 26, 2019 Deposition of Lisa Toth
21	Document produced by GM in this litigation with Bates No. GM-000571921
22	Document produced by GM in this litigation with Bates No. GM-000128851
23	Document produced by GM in this litigation with Bates No. GM-000579841
24	Document produced by GM in this litigation with Bates No. GM-000571924
25	Document produced by GM in this litigation with Bates No. GM-000571927
26	Document produced by GM in this litigation with Bates No. GM-000571931
27	Document produced by GM in this litigation with Bates No. GM-000200247
28	Document produced by GM in this litigation with Bates No. GM-000226752
29	Document produced by GM in this litigation with Bates No. GM-000571946

30	Document produced by GM in this litigation with Bates No. GM-000571951
31	Document produced by GM in this litigation with Bates No. GM-000571956
32	Document produced by GM in this litigation with Bates No. GM-000277344
33	Document produced by GM in this litigation with Bates No. GM-000571968
34	Document produced by GM in this litigation with Bates No. GM-000571974
35	Document produced by GM in this litigation with Bates No. GM-000571980
36	Document produced by GM in this litigation with Bates No. GM-000200212
37	Document produced by GM in this litigation with Bates No. GM-000118990
38	Document produced by GM in this litigation with Bates No. GM-000576733
39	Document produced by GM in this litigation with Bates No. GM-000236672
40	Document produced by GM in this litigation with Bates No. GM-000579468
41	Transcript of the October 11, 2019 Deposition of Dr. Jeffrey K. Ball
42	Supplemental Report of Dr. Jeffrey K. Ball
43	Document produced by GM in this litigation with Bates No. GM-000575234
44	Document produced by GM in this litigation with Bates No. GM-000000001
45	Document produced by GM in this litigation with Bates No. GM-000225240
46	Document produced by GM in this litigation with Bates No. GM-000574550
47	ALLDATA LLC Engine Oil Pressure Specifications
48	Plaintiff Siqueiros Response to GM's First Set of Interrogatories
49	Transcript of the May 21, 2019 Deposition of Raul Siqueiros
50	Cralley Plaintiffs Response to GM's First Set of Interrogatories
51	Transcript of the May 24, 2019 Deposition of Todd Alan Cralley
52	Plaintiff John Knoll Response to GM's First Set of Interrogatories
53	Transcript of the May 3, 2019 Deposition of John Knoll
54	Plaintiff Davis Response to GM's First Set of Interrogatories
55	Transcript of the May 29, 2019 Deposition of William Paul Davis, Jr.
56	Plaintiff Szep Response to GM's First Set of Interrogatories
57	Plaintiff Szep Response to GM's Second Set of Interrogatories
58	Plaintiff Sanchez Supplemental Response to GM's First Set of Interrogatories
59	Transcript of the May 7, 2019 Deposition of Rudy Sanchez
60	Document produced by MAHLE in this litigation with Bates No. MAHLE-001867

I declare under penalty of perjury that the foregoing is true and correct.

Dated: November 21, 2019

Respectfully Submitted,

/s/ H. Clay Barnett, III

H. Clay Barnett, III (*pro hac vice*)

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METHVIN, PORTIS & MILES, P.C.**

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Clay.Barnett@Beasleyallen.com

1 W. Daniel “Dee” Miles, III (*pro hac vice*)
2 J. Mitch Williams (*pro hac vice*)

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4 **METHVIN, PORTIS & MILES, P.C.**

5 218 Commerce Street

6 Montgomery, Alabama 36104

7 Telephone: 334-269-2343

8 Dee.Miles@Beasleyallen.com

9 Mitch.Williams@Beasleyallen.com

10 *Counsel for Plaintiffs and the Proposed*
11 *Classes*